



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUL 12 2013

CERTIFIED MAIL 7012 1010 0001 8097 0177
RETURN RECEIPT REQUESTED

The Honorable Bob Shutt
Mayor of Savannah
140 Main Street
Savannah, Tennessee 38372

Re: Information Request – Section 308 of the Clean Water Act
National Pollutant Discharge Elimination System Permit No.: TN0061565

Dear Mayor Shutt:

Pursuant to Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318, the U.S. Environmental Protection Agency, Region 4 hereby requests the City of Savannah (the City) to provide the information set forth in Enclosure A regarding the wastewater treatment plant noted above and its associated sanitary sewer collection system. The City is required to respond to this information request within 30 days of its receipt of this letter. The response should be directed to:

Mr. Dennis Sayre, Enforcement Officer
U.S. Environmental Protection Agency, Region 4
Clean Water Enforcement Branch
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

The City's response to this information request should specifically reference the particular section and number of the request and should be organized for the purpose of clarity. In addition, all information submitted must be accompanied by the following certification signed by a responsible City official in accordance with 40 C.F.R. § 122.22:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations."

Failure to comply with this information request may result in enforcement proceedings under Section 309 of the CWA, 33 U.S.C. § 1319, which could result in the judicial imposition of civil or criminal penalties or the administrative imposition of civil penalties. In addition, there is potential criminal liability for the falsification of any response to the requested information.

The City shall preserve, until further notice, all records (either written or electronic) which exist at the time of receipt of this letter that relate to any of the matters set forth in this letter. The term "records" shall be interpreted in the broadest sense to include information of every sort. The response to this information request shall include assurance that these record protection provisions were put in place, as required. No such records shall be disposed of until written authorization is received from the Chief of the Clean Water Enforcement Branch of the U.S. EPA, Region 4.

Please feel free to contact Mr. Dennis Sayre, Enforcement Officer at (404) 562-9756 or by email at sayre.dennis@epa.gov, if you have questions regarding this notice and information request.

Sincerely,

A handwritten signature in black ink, appearing to read "Denise D. Diaz" followed by a stylized flourish.

Denisse D. Diaz, Chief
Clean Water Enforcement Branch
Water Protection Division

Enclosure

cc: Ms. Jessica Murphy
Tennessee Department of Environment and Conservation

ENCLOSURE A

SSO PROGRAM City of Savannah, TN

1. Provide the following:
 - a. The size of the City's Sanitary Sewer Collection System (SSS) (linear feet or miles);
 - b. A list of the pump stations in the SSS, including size (gpm), and indicate if back up power is available and if it is adequate to fully operate the pump station;
 - c. A list of all constructed overflow points (any unpermitted constructed discharge points) in the SSS (including pump stations) prior to the headworks of the City's WWTP;
 - d. The average design flow of the City's WWTP;
 - e. The peak design flow of the City's WWTP;
 - f. The annual average flow of the City's WWTP; and
 - g. The population served by the City's WWTP and its respective SSS.
2. For purposes of this Information Request, a sanitary sewer overflow (SSO) is an overflow, spill, release, or diversion of wastewater from the SSS. SSOs include overflows or releases of wastewater that reach waters of the United States (U.S.); overflows or releases of wastewater that do not reach waters of the U.S.; and wastewater backups into buildings that are caused by blockages or flow conditions in a sanitary sewer other than a building lateral. Wastewater backups into buildings caused by a blockage or other malfunction of a building lateral that is privately owned is not an SSO.

Provide a listing of all SSOs that occurred from June 2008 to the present. For each SSO provide the following:

- a. Date(s) of the SSO;
- b. Time (and Date if other than a. above) when the City was notified that the SSO event occurred;
- c. Time (and Date if other than a. above) when the City (or contractor) crew responded to the SSO;
- d. Time (and Date if other than a. above) when the SSO ceased;
- e. Time (and Date if other than a. above) when corrective action was completed;
- f. Location of the SSO, including source (pump station, manhole, etc.);
- g. Ultimate destination of the SSO, such as surface waterbody (by name, if available), storm drain leading to surface waterbody (by name, if available), dry land, building, etc.;
- h. Volume of the SSO;
- i. Cause of the SSO such as grease, roots, other blockages, wet weather (infiltration and inflow), loss of power at pump station, pump failure, etc.;
- j. Corrective actions taken to stop the SSO; and
- k. Corrective actions taken to prevent this or similar SSOs in the future.

If available, please provide the above information in a Microsoft compatible spreadsheet format.

3. If the City has a formal written plan for responding to, addressing, and reporting SSOs (i.e., a Sewer Overflow Response Plan ("SORP")), provide a copy of the plan.

4. Provide a copy of any additional City procedures not included in the SORP (as referenced in Question 3 above) for the following activities:
 - a. Documenting SSOs;
 - b. Estimating SSO volume;
 - c. Identifying root causes of SSOs;
 - d. Containment and clean-up of SSOs, including any specific procedures addressing backups into buildings caused by mainline problems;
 - e. Identifying wet weather related SSOs and reconnaissance of these during rain events; and
 - f. All reporting of SSOs to the permitting authority, the State of Tennessee.
5. Provide the name of the person (or position title) responsible for each of the activities identified in the City's SORP and/or listed in Question 4 above.